

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Ch. 11 Case Nos.
	:	
LORAL SPACE	:	Lead Case 03-41710 (RDD)
& COMMUNICATIONS LTD., <u>et al.</u> ,	:	03-41709 (RDD) through
	:	03-41728 (RDD)
Reorganized Debtors.	:	(Jointly Administered)
	:	
-----X	:	
LORAL STOCKHOLDERS	:	
PROTECTIVE COMMITTEE,	:	
	:	Civ. A. No. 06-5156 (BSJ)
Appellant,	:	
	:	
v.	:	
	:	
LORAL SPACE	:	
& COMMUNICATIONS LTD., <u>et al.</u> ,	:	
	:	
Appellees.	:	
	:	
-----X	:	

**NOTICE OF APPELLEES' MOTION TO DISMISS THE
LORAL STOCKHOLDERS PROTECTIVE COMMITTEE'S APPEAL
AS IT RELATES TO A REQUEST FOR RELIEF UNDER 11 U.S.C. § 1144**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Motion to Dismiss the Loral Stockholders Protective Committee's Appeal as it Relates to a Request for Relief under 11 U.S.C. § 1144, and the accompanying Declaration of Theodore E. Tsekerides (including Exhibits thereto), dated August 10, 2006, Appellees, Loral Space & Communications Ltd. and its affiliated reorganized debtors and debtors in possession, as Appellees (collectively, the "Reorganized Debtors" or "Appellees"), will move this Court, before the Honorable

Barbara S. Jones, United States District Judge for the Southern District of New York (the “District Court”), at the United States Courthouse, 500 Pearl Street, New York, New York 10007-1312 on a date and at a time to be set by the District Court, for an order dismissing the appeal of the self-styled Loral Stockholders Protective Committee (the “LSPC”) of the April 20, 2006 Order of the United States Bankruptcy Court for the Southern District of New York denying the LSPC’s “Motion for Disgorgement of Greenhill’s Fees and Reconsideration of Final Order Under 11 U.S.C. § 1144,” insofar as such appeal relates to a request for relief under section 1144 of title 11 of the United States Code (the “Bankruptcy Code”).

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, answering papers, if any, opposing the dismissal of the appeal as it relates to a request for relief under section 1144 of the Bankruptcy Code, shall be served upon the undersigned no later than September 5, 2006 and shall be filed with the District Court promptly thereafter.

Dated: August 10, 2006
New York, New York

By: /s/ Theodore E. Tsekerides
Stephen Karotkin (SK 7357)
Lori R. Fife (LF 2839)
Shai Y. Waisman (SW 6854)
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